

## **REMARKS**

### **I. INTRODUCTION**

The undersigned Attorney initially contacted the Examiner regarding the “final” status of the Office Action since no prior rejection or Office Action had been issued for the present application. The Examiner agreed that the status of the pending Office Action should have been “non-final,” and corrected the status of the pending Office Action as such.

The undersigned Attorney for the Assignee presents these amendments in response to the non-final Office Action mailed January 29, 2004. Claims 1, 3, 5, 7, 9, and 11 remain pending; while Claims 2, 4, 6, 8, 10, and 12 were withdrawn by the present response, without prejudice to filing continuation or divisional applications. By the present amendment and response, Claim 1 is amended, and the rejections of the present Office Action are traversed for the reasons provided below. It is believed that the present claim amendments overcome the rejections under 35 U.S.C. § 103 that were stated in the non-final Office Action. The undersigned Attorney for the Assignee respectfully requests reexamination and reconsideration of the application as amended, and further requests allowance of the amended claims.

### **II. THE REJECTION UNDER 35 U.S.C. § 103**

The Office Action rejected Claims 1, 3, 5, 7, 9, and 11 under 35 U.S.C. § 103, as being unpatentable for obviousness in view of *Hasegawa*, JP Patent No. 09117567 (hereinafter “*Hasegawa*”). In view of the present amendments to the claims, kindly re-examine and reconsider the application.

**A. Amendment to Independent Claim 1**

Independent Claim 1 has now been amended to clarify the Applicant's claimed invention. In particular, independent Claim 1 has been amended to clarify that the Applicant's claimed invention includes "at least one medal keeping and paying server apparatus ... and a plurality of a medal keeping and paying client apparatus...." (Underlining supplied). These amendments are fully supported by the Applicant's specification.

The Office Action admits that *Hasegawa* does not disclose a "network interface." Office Action, p. 3, lines 4-5. Amended Claim 1 includes "at least one medal keeping and paying server apparatus" and a "plurality of medal keeping and paying client apparatus" connected to each other via a network through respective network interfaces. Specifically, amended Claim 1 includes "at least one medal keeping and paying server apparatus ... and a plurality of medal keeping and paying client apparatus...." (Underlining supplied). The processing sections of both the medal keeping and paying "server" apparatus and plurality of a medal keeping and paying "client" apparatus provide access to the operation information storing means such as a hard disk 65, through a network interface. The operation information storage means provides the system with the capabilities to input, store and renew various information including count information. Furthermore, the operation information storage means provides the capability to utilize or share a single program between the medal keeping and paying "server" apparatus and plurality of a medal keeping and paying "client" apparatus for data access between the processing sections and the operation information storing means without need for a dedicated, central host computer for processing data.

In contrast, the device disclosed in *Hasegawa* does not teach or suggest a medal keeping and paying “server” apparatus or a plurality of medal keeping and paying “client” apparatus. The device in *Hasegawa* does not communicate via a network, nor does *Hasegawa* disclose a network interface. Therefore, *Hasegawa* does not disclose or suggest the amended claim element of Claim 1, “at least one medal keeping and paying server apparatus ... and a plurality of medal keeping and paying client apparatus...” (Underlining supplied).

The Office Action still argues that it would have been obvious to one of ordinary skill in the art at the time the invention was made to improve the *Hasegawa* device with the capability of interconnecting a plurality of devices via a computer network to a central computer. Office Action, p. 3, lines 6-10. The Office Action does not cite a specific reference for any motivation, yet the Office Action argues that one of ordinary skill in the art would be motivated to do so in order to modify and allow the central host computer to monitor the usage and payout, of the individual devices, wherein the report can be used by management to assess profitability of individual devices. Office Action, p. 3, lines 10-15.

These arguments are traversed for at least the following reasons: (1) the claimed invention does not include a central host computer such as a dedicated server; and (2) the claimed invention includes a system with a medal keeping and paying apparatus that can perform both server-type and client functions.

According to amended Claim 1, the claimed invention includes “at least one medal keeping and paying server apparatus” and “a plurality of medal keeping and paying client apparatus.” In the claimed invention, while at least one medal keeping and paying server apparatus performs a server-type function, it does not act as a “central host computer” since there can be more than one medal keeping and paying server apparatus.

Furthermore, each medal keeping and paying server apparatus includes functionality similar to each of the plurality of medal keeping and paying client apparatus. Specifically, the medal keeping and paying server apparatus includes a medal keeping means, medal paying means, right person information inputting means, right person information storing means, memory, and processing section. The ability of each medal keeping and paying server apparatus to perform both server-type and client functions is neither disclosed nor suggested by the cited reference or the Office Action, and distinguishes the claimed invention from the alleged modifications to *Hasegawa* proposed by the Office Action.

As described above, more than one of the medal keeping and paying server apparatus can provide a server-type function. For example, as described on p. 11 of the Applicant's specification, two medal keeping and paying server apparatuses (1A and 1B) can perform server-type functions such including an operation information storing means or hard disk. As described above and in the specification, each medal keeping and paying server apparatus can also perform client functions. Again, the ability of each medal keeping and paying server apparatus to perform both server-type and client functions distinguishes the Applicant's invention from the alleged modifications to *Hasegawa* proposed by the Office Action.

Each of the medal keeping and paying client apparatus perform client functions including providing access to the operation information storing means of the medal keeping and paying server apparatus. Since the claimed invention of amended Claim 1 does not operate using a dedicated "central host computer," the claimed invention is quite different from the device disclosed in *Hasegawa* which would require a dedicated, central host computer to act as a server to process data, such as count information from a plurality of devices. Such a dedicated server or "central host computer" would lack client

functionality, and is distinguishable from the claimed invention. Therefore, amended Claim 1 is not suggested by the cited reference, and therefore patentable subject-matter.

***B. Dependent Claims 3, 5, 7, 9, and 11***

Claims 3, 5, 7, 9, and 11 were rejected as obvious due to their dependency from a rejected base independent claim. Claim 1 has been amended to overcome an obviousness rejection and therefore, claims 3, 5, 7, 9, and 11 should now be in condition for allowance.

**III. Amendment of the Abstract**

The Abstract has been corrected in accordance with the Office Action suggestions, and limited to a single paragraph within a range of 50 to 150 words. Furthermore, grammatical errors in the Abstract have been now been corrected. No new matter has been added.

**CONCLUSION**

For at least the reasons given above, it is respectfully submitted that amended Claim 1, and Claims 3, 5, 7, 9 and 11 define patentable subject matter in view of the amendments and remarks made above. Further, it is respectfully requested that immediate allowance of the claims and notice thereof be issued. Should the Examiner believe that anything further is necessary in order to place the application in better condition for allowance, the Examiner is respectfully requested to contact the undersigned attorney at the telephone number listed below. No additional fees are believed due; however, the Commissioner is hereby authorized to charge any deficiency, or credit any overpayment, to Deposit Account No. 11-0855.

Respectfully submitted,



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